

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**VERONICA MARTINEZ, both individually and on
behalf of all other similarly situated persons,**

Plaintiffs,

v.

**BROADRIDGE FINANCIAL SOLUTIONS, INC.,
and TMG MAILING SOLUTIONS, INC.,**

Defendants.

Case No. 2:20-CV-03722

I, Artemio Guerra, being of full age, hereby certify as follows:

1. I am an attorney at law and am fully familiar with the facts and circumstances of the above-captioned matter. I make the statements herein based on personal knowledge and would so testify if called as a witness before the Court.
2. I am an associate of the law firm Getman, Sweeney & Dunn, PLLC, located at 260 Fair St., Kingston, New York, 12401. I make this Certification in support of the Motion made on behalf of Plaintiffs for my *pro hac vice* admission in the above-captioned matter.
3. I received a J.D. from Fordham Law School in 2010.
4. I am a member in good standing of the bar of the following Courts.

Courts	Address	Admission Year
New York State Supreme Court, Appellate Division – Second Judicial Department	45 Monroe Place, Brooklyn, NY 11201	2011
United States District Court for the Southern District of New York	500 Pearl Street, New York, NY 10007	2011
United States District Court for the Eastern District of New York	225 Cadman Plaza East, Brooklyn, NY 11201	2011

United States District Court for the Western District of New York	100 State Street Rochester, NY 14614	2012
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5. I am not admitted to the bar of this Court or to the bar of the State of New Jersey and request that I be admitted *pro hac vice* for the purposes of this case. The firm of Green Savits, LLP has been serving as liaison counsel in connection with the above-captioned action as required by L. Civ. R. 101.1(c). Glen Savits, a member of that firm, is directly involved in this action has agreed to serve as local counsel on this case and is a member in good standing of the Bar of this Court.
6. I respectfully submit that there is good cause for my admission *pro hac vice* to represent Plaintiffs in this litigation. I have substantial experience in the prosecution of labor and employment actions, as well as class and collective wage and hour actions, such as the within action. Therefore, my admission *pro hac vice* will materially assist in the efficient and effective representation of the plaintiff class in these matters.
7. No disciplinary proceedings are currently pending against me in any jurisdiction, and no discipline has previously been imposed on me in any jurisdiction. I will promptly advise the Court if any new disciplinary proceedings are instituted against me.
8. I agree to abide by all the Rules of this Court, including, but not limited to the provisions of L. Civ. R. 103.1, the New Jersey Rules of Professional Conduct, and L. Civ. R. 104.1, Discipline of Attorneys, and agree to take no fee in any tort case in excess of the New Jersey Court Contingency Fee Rule, R. 1:21-7, as amended.
9. For the foregoing reasons, I respectfully request that the Court enter an Order admitting me to practice *pro hac vice* for all further proceedings in this case. I agree to make annual payments to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a) and to the Clerk of this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 30, 2020

A handwritten signature in black ink, appearing to read "Artemio Guerra", written over a horizontal line.

Artemio Guerra
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